

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:18CR119
v.	§	Judge Mazzant
	§	
MUZAMIL KHAN (1)	§	

ELEMENTS OF THE OFFENSE

The defendant, **Muzamil Khan (Khan)**, is charged in Count One of the Information with violating of 18 U.S.C. § 1597(a)(3) (Unlawful Conduct with Respect to Immigration Documents). The elements of the offense that the government must prove beyond a reasonable doubt, but that **Khan** would admit if his plea is accepted, are:

1. The defendant knowingly destroyed, concealed, removed, confiscated or possessed the passport or other immigration document of another individual;
2. The defendant acted in order to maintain, prevent, or restrict the labor or services of the individual; and
3. The defendant did so without lawful authority.

Respectfully submitted,

JOSEPH D. BROWN
UNITED STATES ATTORNEY

/s/

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CERTIFICATE OF SERVICE

I certify that a copy of this document was served by electronic filing to opposing counsel on November 27, 2019.

/s/

Marisa J. Miller